## **REMARKS**

The present response is filed with a Request for Continued Examination (RCE) and is responsive to the Office Action mailed in the above-referenced case Oct. 25, 2002, made final. Claims 2-10 and 12-18 are pending for examination. The Examiner has rejected claim 5 under 35 U.S.C. 112 due to informalities. Claims 2-10 and 12-18 remain rejected under 35 U.S.C. 102(e) as being anticipated by Rogers et al. (U.S. 5,946,346), hereinafter Rogers.

Applicant has again carefully studied the prior art presented by the Examiner, and the Examiner's rejections and statements in the instant Office Action. In response, applicant herein amends the claims to more particularly point out and distinctly claim the subject matter of applicant's invention regarded as patentable, and to distinguish unarguably over the prior art as cited and applied by the Examiner. Applicant points out and argues the key limitations in the base claims as amended that the Examiner appears to have misunderstood in his rejections and statements.

Regarding the 112 rejection of claim 5, applicant herein amends the language of claim 2 to recite routing IPNT calls at a customer premises call center, thereby clarifying the antecedent basis for the language of claim 5 in question.

As to the merit rejection of applicant's claims, regarding claim 2, the Examiner states that Rogers teaches a method for routing IPNT calls at customer premises comprising all of the limitations of applicant's claim. In response, applicant herein further amends the language of claim 2 to more particularly point out and distinctly claim the subject matter regarded as patentable.

Applicant amends the language of claim 2 to specifically recite a plurality of agent stations coupled to the managing processor, each agent station

comprising a computer digitally connected to a telephone forming an IPNT-capable workstation, and in step (d), routing the call to the IPNT-capable workstation associated with the intended recipient of step (b), according to the current routing rules specific to the intended recipient.

Applicant's claim 2 as amended now recites:

- 2. (Amended) A method for routing Internet Protocol Network Telephony (IPNT) calls at customer premises having a managing processor and a plurality of agent stations coupled to the managing processor, each agent station comprising a computer digitally connected to a telephone forming an IPNT-capable workstation, the managing processor storing a current set of routing rules specific to and accessible and editable by a person assigned to the computer workstation, the method comprising steps of:
  - (a) receiving an IPNT call at the managing processor;
- (b) determining the person assigned to the IPNT-capable workstation is an intended recipient for the call;
- (c) requesting routing by the managing processor from the specific set of current routing rules for the workstation, accessible and editable by the person assigned to the computer workstation; and
- (d) routing the call to the IPNT-capable workstation associated with the intended recipient according to the current routing rules specific to the intended recipient.

Applicant's independent claim 10 recites a method for individual customization of routing rules for the received calls in accordance with claim 2, and independent claim 13 recites a call router system for determining routing of

incoming IPNT calls in a customer premises call center. Applicant herein amends the language of claim 10 to recite that the IPNT call center in which the method is practiced has a managing processor coupled to a plurality IPNT-capable agent workstations, and also herein amends the language of claim 13 to recite that the managing processor is connected to individual IPNT-capable computer workstations, the managing processor having sets of routing rules specific to individual agents associated with the workstations, in accordance with the amended language of applicant's claim 2. Said amendments are detailed in the Markups section of the present response.

In the previous response filed by applicant on August 22, 2002, applicant argued that the voice over Internet calls of Rogers couldn't read on the claimed IPNT calls because the calls are converted to standardized telephony signals. In response, the Examiner disagreed, stating that Rogers teaches a voice over Internet interface and receiving calls directly over the Internet, and that Internet callers use terminals which receive and transmit Internet information in a similar manner to that taught by applicant. The Examiner further stated that applicant's specification provides no disclosure that the IPNT calls do not use PSTN facilities, and that the figures and the disclosure all suggest that callers and agents use PSTN facilities to conduct IPNT calls, and if the IPNT calls use PSTN facilities, there must be conversion of the calls in a similar manner to Rogers. Applicant respectfully traverses the Examiner's statement.

Applicant directs the Examiner's attention to Fig. 7 of applicant's specification, wherein a block diagram of a call and information routing and call-center system according to an alternative embodiment of the present invention is illustrated. The system of Fig. 7 has all of the connectivity and functionality of the system described for Fig. 6, including, in addition, a data connection between each telephone in the call-in center and the associated PC. For example, PC 1161 is connected to telephone 1162 by a data link 1163, and PC 1171 is connected to

telephone 1172 by data link 1173. Moreover, as described for Fig. 6, each PC is connected on LAN 1152, which also connects to file server 1153 and to processor 1151 running an instance of T-Server 1114.

Referring to Fig. 7, telephony switch 1120 is connected to trunk lines 1164 and 1174 directly to telephones 1162 and 1172 at the call center, enabling routing of calls from telephony switch 1120 directly to telephones 1162 and 1172. Telephony switch 1120 is also enabled for routing IPNT calls over CTI connection 1119 to processor 1151, which runs an instance of T-server application 1114, which then routes the IPNT calls via LAN 1152 to computers 1161 and 1171. Computer 1161 and telephone 1162 connected by digital link 1163, and computer 1171 digitally connected to 1172 via link 1173, form a pair of IPNT-capable agent workstations which are capable of handling the incoming IPNT calls routed from processor 1151 without converting the calls to PSTN.

Applicant argues that the above portion of applicant's specification clearly supports that IPNT calls may be routed from telephony switch 1120, through processor 1151, directly to the IPNT-capable agent workstations comprising computers 1161/1171 and telephone 1162/1172, without converting the calls to PSTN. The reference of Rogers, therefore, clearly cannot read on applicant's invention as embodied in the independent claims as amended.

Applicant believes independent claims 2, 10 and 13 as amended are therefore clearly and unarguably patentable over the reference of Rogers. Claims 3-9, 12 and 14-18 are then patentable on their own merits, or at least as depended from a patentable claim.

As all of the claims standing for examination as amended have been shown to be patentable over the art of record, applicant respectfully requests reconsideration after final and that the present case be passed quickly to issue. If there are any time extensions due beyond any extension requested and paid with this amendment, such extensions are hereby requested. If there are any fees due

beyond any fees paid with the present amendment, such fees are authorized to be deducted from deposit account 50-0534.

Respectfully Submitted,

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## **Version With Markings to Show Changes Made**

## In the claims:

- 2. (Amended) A method for routing Internet Protocol Network Telephony (IPNT) calls at customer premises having a managing processor and a [computer workstation] plurality of agent stations coupled to the managing processor, each agent station comprising a computer digitally connected to a telephone forming an IPNT-capable workstation, the managing processor storing a current set of routing rules specific to and accessible and editable by a person assigned to the computer workstation, the method comprising steps of:
  - (a) receiving an IPNT call at the managing processor;
- (b) determining the person assigned to the <u>IPNT-capable</u> workstation is an intended recipient for the call;
- (c) requesting routing by the managing processor from the specific set of current routing rules for the workstation, accessible and editable by the person assigned to the computer workstation; and
- (d) routing the call to the IPNT-capable workstation associated with the intended recipient according to the current routing rules specific to the [person] intended recipient.
- 10. (Amended) In a customer premises Internet Protocol Network Telephony call center having a managing processor <u>coupled</u> to a <u>plurality of IPNT-capable agent</u> <u>workstations</u>, including sets of routing rules specific to individual agents assigned to <u>the</u> workstations, the managing processor for routing received calls to individual ones of the connected agents at <u>the</u> computer workstations, a method

for individual customization of routing rules for the received calls, comprising steps of:

- (a) executing a client user interface on one of the computer workstations by an agent at the station;
- (b) determining routing for the received calls addressed to the computer workstation at the computer workstation by the agent at the workstation using the client user interface to access and edit personal routing rules;
- (c) transmitting the routing determination to a router executing on the managing processor; and
- (d) routing the received telephone calls by the router according to the transmitted routing determination.
- 13. (Amended) A call router system for determining routing of incoming Internet Protocol Network Telephony calls in a customer premises call center including a managing processor connected to individual <u>IPNT-capable</u> computer workstations, the managing processor having sets of routing rules specific to individual agents <u>associated with the workstations</u>, the router system comprising:

a client user interface executable on one of the computer workstations, and adapted to provide functions for editing routing rules for individual agents; and

a router listing current routing rules specific to the agent at the workstation;

wherein the client user interface is adapted to transmit agent-edited routing rules to the router, and the router is adapted to provide routing to incoming calls addressed to the agent according to the current routing rules.